

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

Criminal No. 19-331

SUE O'NEILL

**MOTION FOR PRELIMINARY ORDER OF CRIMINAL FORFEITURE
AGAINST SUE O'NEILL**

AND NOW comes the United States of America by and through its counsel, Scott W. Brady, United States Attorney for the Western District of Pennsylvania, and Lee J. Karl, Assistant United States Attorney for the Western District of Pennsylvania, and pursuant to Federal Rule of Criminal Procedure 32.2, respectfully moves for a preliminary order of forfeiture, and in support thereof, represents as follows:

1. On November 13, 2019, Sue O'Neill ("O'Neill") entered a guilty plea to Counts One and Seven of the Information at Criminal No. 19-331. O'Neill also agreed to forfeit all right, title and interest in the property identified on Exhibit A, attached hereto, to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) (the "Subject Property").

2. The United States respectfully requests that the Court enter a Preliminary Order of Criminal Forfeiture and that the forfeiture of O'Neill's interest in the Subject Property be incorporated into her sentence and judgment pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.

3. Upon the issuance of the Preliminary Order of forfeiture against O'Neill, the United States will provide written notice to all third parties, if any, known to the United States

who may have an interest in the Subject Property. The United States will also advertise notice of this forfeiture proceeding via the government's internet forfeiture website.

WHEREFORE, the United States respectfully requests that this Honorable Court enter a Preliminary Order of Criminal Forfeiture forfeiting to the United States all right, title and interest of the defendant in the Subject Property, and that the forfeiture of the defendant's interest in the Subject Property be incorporated into her sentence and judgment.

Respectfully submitted,

SCOTT W. BRADY
United States Attorney

/s/ Lee J. Karl
LEE J. KARL
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CERTIFICATE OF SERVICE

I hereby certify that the United States' Motion for Preliminary Order of Criminal Forfeiture against Sue O'Neill has been served through the electronic filing system this 16th day of December, 2019, upon the following:

Martin A. Dietz, Esquire
mdietzesquire@gmail.com

/s/ Lee J. Karl
LEE J. KARL
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